

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PETER PEDERSEN,

Plaintiff,

v.

ZOHO CORPORATION.,

Defendant.

Case No. 6:22-cv-00408-ADA

JURY TRIAL DEMANDED

**PLAINTIFF PETER PEDERSEN'S RESPONSE TO ZOHO'S IMPROPER FILING OF
NOTICE OF NONOPPOSITION TO MOTION TO TRANSFER**

On October 20, 2022, Zoho filed the present motion to transfer venue to the Austin Division (Zoho's Motion).¹ Pedersen initially filed a Notice of Venue Discovery.² That filing reset the date of Pedersen's response to Zoho's Motion to January 5, 2023. The response was drafted and ready to file on January 5, 2023. However, it was mistakenly not filed until January 6, 2023. Counsel for Plaintiff contacted Counsel for Defendant to request an extension of one day but was rejected even though Plaintiff allowed Defendant a waiver of service³ thereby granting a 60-day extension of time to answer.

Regardless, Defendant's Notice of Non-Opposition is incorrect. Plaintiff did oppose by filing a Notice of Venue Discovery.⁴ However, in preparing the discovery, Plaintiff determined

¹ Doc. No. 14.

² Doc. No. 15.

³ Doc. No. 5.

⁴ Doc. No. 15.

discovery was not needed and instead Plaintiff responded to the Motion to Transfer.⁵ Therefore, the Motion is opposed and Defendant's filing is misleading.

I. CONCLUSION

For the reasons provided in Pedersen's Response,⁶ Zoho's motion to transfer this case to the Austin Division should be denied as it is not clearly more convenient for this case to proceed in the Austin Division.

Dated: January 18, 2023

Respectfully Submitted

Ramey LLP

/s/William P. Ramey, III
William P. Ramey, III
Texas Bar No. 24027643
5020 Montrose Blvd., Suite 800
Houston, Texas 77006
(713) 426-3923 (telephone)
(832) 900-4941 (fax)
wramey@rameyfirm.com

Attorneys for Peter Pedersen

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I hereby certify that all counsel of record who have appeared in this case are being served on this day of January 18, 2023, with a copy of the foregoing via ECF.

/s/ William P. Ramey, III
William P. Ramey, III

⁵ Doc. No. 16.

⁶ Doc. No. 16.